

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

vs.

CRIMINAL NO. 3:17-cr-140-DPJ-FKB

HEATHER ELIZABETH WRIGHT-BEARD

UNOPPOSED MOTION TO WITHDRAW

COME NOW, undersigned counsel, Lawrence M. Coco, III and the law firm McCraney, Coco & Lee, PLLC and file this Unopposed Motion to Withdraw as counsel for Defendant Heather Elizabeth Wright-Beard, and would show unto this Court the following:

1. November 28, 2017, Defendant Beard was Indicted for allegedly being a felon in possession of a firearm in violation of 18 U.S.C. §§ 922(g)(1) & 924(a)(2). On or about February 9, 2018, Mrs. Beard's prior counsel withdrew, and undersigned counsel was assigned the representation through Office of the Federal Public Defender. Currently, trial is set for the term of court beginning on May 8, 2018.

2. However, on February 14, 2018, undersigned counsel was appointed Head of School at Jackson Preparatory School, located in Flowood, Mississippi. Undersigned counsel begins this employment on June 1, 2018. During the coming months, undersigned counsel will be transitioning into the role of Head of School and transitioning his law practice to other members of the firm. However, such members of the firm are not on the CJA panel list from the Office of the Federal Public Defendant and, consequently, are not authorized to serve as lead counsel in this matter. Additionally, while trial of this matter is set for the term of court beginning on May 8, 2018, there exists a likelihood that the representation could extend past June 1, 2018, given possible continuances, post-trial motions, etc. Accordingly, undersigned counsel respectfully submits that he and his law firm should be allowed to withdraw from the

representation of Mrs. Beard, so that the Office of the Public Defender can appoint new counsel and allow such counsel to handle the entire case to conclusion.

3. Undersigned counsel has conferred with the Government, Ms. Keesha Middleton, and she has confirmed that the Government does not oppose the instant Motion to Withdraw. A copy of this Motion also is being provided to Defendant Beard.

4. Accordingly, undersigned counsel and the law firm of McCraney, Coco & Lee, PLLC respectfully request that they be allowed to withdraw as counsel of record from the instant matter.

WHEREFORE, PREMISES CONSIDERED, Lawrence M. Coco, III and McCraney Coco & Lee, PLLC respectfully submit that the Motion to Withdraw should be granted.

Respectfully submitted, this the 28th day of February, 2018.

McCraney, Coco & Lee, PLLC

/s/ Lawrence M. Coco, III

Lawrence M. Coco, III (MSB#100378)

OF COUNSEL

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CERTIFICATE OF SERVICE

I, Lawrence M. Coco, III do hereby certify that I have this date electronically filed the above and foregoing document with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

This the 28th day of February, 2018.

/s/ Lawrence M. Coco, III
Lawrence M. Coco, III